

# **Exhibit G**

**Timothy Snickles**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Rodriguez, et al. v. The Islamic Republic of Iran</i>	18-cv-12347 (GBD)(SN) ECF Case

**DECLARATION OF TIMOTHY SNICKLES**

I, Timothy Snickles, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
2. I was a citizen of the United States on September 11, 2001, and I remain so today.
3. On September 11, 2001, I was a New York State Trooper assigned to Troop B, Ray Brook, Essex County, New York.
4. On the morning of September 11, 2001, I was on duty when I learned of the terrorist attacks on the World Trade Center. I returned to our headquarters to learn what our assignments would be in the rescue and recovery efforts in coordination with other law enforcement agencies in New York City.
5. I was part of a New York State Police (NYSP) presence in Lower Manhattan, patrolling and providing security around Ground Zero and the area in its immediate vicinity beginning soon after the attacks. We were assigned, on a rotating basis, to tours of seven days. I served seven, seven-day tours between September 15, 2001 and February 2002. We worked twelve-hour shifts from 7:00p.m. to 7:00 a.m.

6. In between shifts, we assisted the recovery effort by working on the pile with firemen and others clearing debris in the "bucket brigade." The appearance of Ground Zero was shocking. There were piles of rubble everywhere and as the recovery effort continued, we were working six stories below the street level in what had been the foundation of the towers.

7. Months after the attacks the remnants of the towers and other buildings that had been destroyed were still smoldering. In addition to the plume of smoke that was always present at Ground Zero, there were portions of the site that were still burning. During the months I worked at the site, the air was gray. Dust and ash covered everything for blocks in all directions. The only protective gear we were provided was a paper mask.

8. While I was working at the site, I did not notice any specific physical problems. It was sometimes difficult to breathe, but I attributed this to the heat and the work we were doing. The symptoms of my exposure to the toxins at the site did not begin to appear until over a year after I had left New York City.

9. In May of 2003, I experienced what felt like a broken bone in my foot. I noticed a red streak starting at my ankle and running up my leg. I sought medical treatment at Adirondack Medical Center in Saranac Lake, NY. At that time, I was also having problems with persistent cough, a burning sensation in my chest and shortness of breath. I was hospitalized for seven days. The diagnoses was indeterminant with respect to my lung issues, but the problem with my foot was thought to be a skin infection, cellulitis, and I was put on a course of antibiotics.

10. In July 2003 I continued to have problems with both my foot and my lungs. I went to Albany Medical Center in Albany, NY for treatment. In Albany, a bronchoscopy was performed and it was determined that I was suffering from blastomycosis, a fungal infection in my lungs. An M.R.I. and further examination of my foot revealed that I had also developed a fungal infection of

the bone in my foot, osteomyelitis. I was admitted to the hospital where I remained for nine days undergoing treatment. It was necessary to perform surgery on my foot. A section of bone taken from my hip was grafted to replace the damaged bone in my foot. The fungal infection in my lungs had caused lesions, which are still present and continue to adversely affect my ability to breathe.

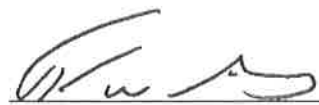
11. I continue to have health problems as a result of my exposure to the dust, ash, chemicals, and other toxins I was exposed to in the days and months following the terrorist attacks. I suffer from a persistent cough and shortness of breath. I have more acute episodes when I am exposed to cold temperatures. My foot, while repaired in 2003, still limits my mobility and causes me discomfort.

12. My physical injuries and conditions have been confirmed through the World Trade Center Health Program (WTCHP) and determined to be eligible for compensation by the Victim Compensation Fund (VCF).

13. Following the evaluation of my conditions by the WTCHP, I pursued a claim with the VCF and was found eligible for compensation for interstitial lung disease and related conditions: dyspnea. A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 is submitted with this Declaration as part of this exhibit.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 27<sup>th</sup> day of March, 2025.

  
Declarant Timothy Snickles



September 11th  
Victim Compensation Fund

December 2, 2015

TIMOTHY SNICKLES



Dear TIMOTHY SNICKLES:

Your Eligibility Form for the September 11th Victim Compensation Fund ("VCF") has been reviewed. Your claim number is VCF0012959. The Claims Evaluator determined that your Eligibility Form was substantially complete on December 2, 2015. As stated in the Regulations and on the Eligibility Form, by filing a substantially complete Eligibility Form you have waived your right to file or be a party to a September 11th-related lawsuit. For more information about this topic, please review Frequently Asked Questions ("FAQs") #7.1 - #7.4 on the [www.vcf.gov](http://www.vcf.gov) website.

**The Decision on your Claim**

The VCF has determined that you meet the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, you have been found eligible for the following injuries:

- INTERSTITIAL LUNG DISEASE AND RELATED PHYSICAL CONDITIONS: DYSPNEA

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or loss calculation.

**What Happens Next**

If you have been certified for treatment by the WTC Health Program for a condition not listed above, you should amend your claim. Please see the VCF website for details on how to amend your claim. The VCF will contact the WTC Health Program to confirm the condition is eligible.

If you believe you have eligible injuries not treated by the WTC Health Program and you would like the VCF to consider those injuries before calculating your compensation, you should



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amend your claim. If you choose to amend your claim, you will need to use the VCF Private Physician process. The Private Physician process is a way for the VCF to gather the required information about your treatment in order to process your claim. All forms are available on the VCF website under "Forms and Resources." The website also includes detailed information and instructions on the Private Physician process.

**If you do not have injuries other than those listed above**, you should submit your Compensation Form and required supporting materials. If you have already submitted your Compensation Form, you do not need to take any action at this time unless contacted again by the VCF.

**If in the future you are diagnosed with a new 9/11-related condition** or if the WTC Health Program certifies you for treatment for a condition that was not previously certified, you may amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision. Please see the VCF website for additional details on how to amend your claim and the specific circumstances that may be appropriate to request an amendment.

**Please remember all information and materials must be submitted to the VCF by October 3, 2016.**

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100. Every effort will be made to respond to your inquiries as soon as possible.

Sincerely,

Sheila L. Birnbaum  
Special Master  
September 11th Victim Compensation Fund